

TERRY GLEN TUCKER, ESQUIRE  
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80 WEST BROAD STREET  
BRIDGETON, NEW JERSEY 08302  
(856) 453-7440  
Attorney for Defendant(s)

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Patricia Morgan

**Debtor**

: UNITED STATES  
: BANKRUPTCY COURT  
: FOR THE DISTRICT OF NJ  
: CIVIL ACTION  
CASE NO. 19-17188/JNP  
:**NOTICE OF MOTION:**  
Returnable: April 6, '21 @ 11:00 pm

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Kevin Mc Donald Esq	PNC Bank NA
KLM Law Group PC	PO Box 94982
216 Haddon Ave #406	Cleveland, OH 44101
Westmont, NJ 08101	ATTN: Denise Carlon

Isabel C Balboa, Trustee  
535 Rte 38, #580  
Cherry Hill, NJ 08002

Office of US Trustee  
One Newark Center, Suite 2100  
Newark, NJ 07102

**TAKE NOTICE** that the undersigned will apply to the above named Court, at the Mitchell H. Cohn U.S Courthouse, 400 Cooper Street, Camden, New Jersey, on **April 6, 2021 @ 11:00 pm**, or as soon as counsel may be heard if upon objection, for an **Order Reinstating the Stay as to PNC Bank**

See Attached Affidavit and Proposed Order.

Oral argument is not requested.

A proposed form of Order is annexed hereto.

Dated: March 8,  
2021

/s/ Terry Glen Tucker, Esquire